

Jim Harnett
19-9-4



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October 21, 2019

Mary Nichols, Chairwoman
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Maximize Investment in Zero-Emission Buses in FY 2019-20 Funding Plan

Chairwoman Nichols and Board Members:

On behalf of the San Mateo County Transit District (SamTrans), I am writing to respectfully urge you to maximize California's investment in zero-emission buses (ZEBs), and the associated infrastructure. This investment, which should flow to public transit agencies through the proposed Advanced Technology Demonstration and Pilots Projects and the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), is critical to offsetting the high upfront cost of ZEB deployments. Increased funding will support SamTrans implementation of the Innovative Clean Transit (ICT) regulation while avoiding impacts to our core transit service.

As you review our request, we ask that you consider that public transit is the only industry in the transportation sector entirely subsidized by the public. We also ask that you recall that by adopting the ICT regulation, our industry was specifically selected to serve as the testing ground for zero-emission heavy-duty technologies. The ICT regulation was adopted on the premise that the broad deployment of ZEBs will develop the components, supply chains, knowledge and experience necessary to electrify other heavy-duty industries. SamTrans, like transit agencies across the state, has accepted this task and is working to implement the ICT regulation.

We are strongly committed to converting our fleet. Today, we have two (2) ZEBs in operation and eight (8) ordered. Your decision to prioritize the electrification of our fleets should require ARB to also prioritize transit agencies when it comes to funding.

We are concerned that transit agencies are ineligible for Advanced Technology Demonstrations and Pilot Project funding. We urge you to consider setting aside a portion of this funding for a large-scale demonstration of ZEBs, inclusive of infrastructure buildout. A demonstration of this kind could serve as a roadmap for transit agencies statewide.

We also urge you to consider modifying several of the programmatic changes proposed for HVIP,

with the goal of holding transit agencies harmless, regardless of the oversubscription of the program.

More specifically, we recommend that the Board: establish a set-aside for ZEBs, ensuring that transit agencies receive a minimum funding level from the program; retain the voucher enhancement for infrastructure be preserved for all transit agencies; and, exclude public fleets from the potential reduction of voucher amounts.

SamTrans looks forward to continuing to work with you on the implementation of the ICT regulation. Thank you for considering our request.

Sincerely,



Jim Hartnett
General Manager/Chief Executive Officer

cc: San Mateo County Transit District Board of Directors
San Mateo County Transit District Legislative Delegation
Virgil Welch, Senior Advisor, Office of the Chair Jack Kitowski, Chief, Mobile Source
Control Division
Lucina Negrete, Branch Chief, Mobile Source Control Division – Innovative Strategies
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Jason Crow, Mobile Source Control Division – Innovative Strategies Branch

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